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VIA ECF

Hon. Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
Courtroom 21A
500 Pearl Street
New York, NY 10007-1312

**Re: *Savage v. Assoc. Newspapers Ltd., et al.*, No. 1:24-cv-03280-NRB
Savage v. NYP Holdings, Inc., et al., No. 1:24-cv-03278-NRB**

Dear Judge Buchwald:

This firm represents all defendants (“Defendants”) in the above-referenced related cases. We write with the consent of Plaintiff’s counsel to respectfully request that the current briefing schedule for Defendants’ motions to dismiss the complaints in both of the above-referenced cases be extended by three business days, as follows:

	Current Deadline	Proposed Extension
Opening briefs to be filed by:	11/11/24	11/14/24
Opposition to be filed by:	12/16/24	12/19/24
Reply to be filed by:	1/10/25	1/15/25

There have been no previous requests for an extension of the briefing schedule. If granted, this extension would not affect any other deadlines. We thank the Court for its attention to this request.

Respectfully submitted,

/s/ Robert D. Balin

Robert D. Balin